



Plaintiffs were thus ineligible to receive certificates of restoration. In addition, at the time of the operative Complaint, none of the above-named Plaintiffs had had their full citizenship rights restored. (*Id.*). The NAACP does not have organizational or representational standing. As such, the Plaintiffs lack standing to sue and their claims are due to be dismissed.

Sixth Circuit precedent holds that a Motion to Dismiss for lack of subject matter jurisdiction may be brought at any time. *Perma v. Health One Credit Union*, 983 F.3d 258, 274 (6th Cir. 2020).

In support of this Motion, Defendants file a supporting Memorandum of Law and rely on the above-cited deposition transcripts.

Respectfully submitted,

JONATHAN SKRMETTI  
Attorney General and Reporter

/s/ Dawn Jordan  
DAWN JORDAN, BPR# 20383  
Special Counsel

ZACHARY L. BARKER  
Senior Assistant Attorney General

DAVID RUDOLPH  
Senior Assistant Attorney General

ROBERT WILSON  
Senior Assistant Attorney General

Office of the Attorney General  
P.O. Box 20207  
Nashville, TN 37202-0207  
[Zachary.Barker@ag.tn.gov](mailto:Zachary.Barker@ag.tn.gov)

*Counsel for Defendants*

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the above document has been forwarded electronically. Notice of this filing will be sent by the Court's electronic filing system to the parties named below. Parties may access this filing through the Court's electronic filing system.

Blair Bowie  
Danielle Lang  
Alice C. Huling  
Valencia Richardson  
Aseem Mulji  
Ellen Boettcher  
Kate Uyeda  
Kathryn Huddleston  
Campaign Legal Center  
1101 14<sup>th</sup> Street NW, Suite 400  
Washington, DC 20005

Phil Telfeyan  
Natasha Baker  
Equal Justice Under Law  
400 7<sup>th</sup> St. NW, Suite 602  
Washington, DC 20004

Charles K. Grant  
Denmark J. Grant  
Baker, Donelson, Bearman  
Caldwell & Berkowitz, P.C.  
1600 West End Avenue, Suite 2000  
Nashville, TN 37203

Keeda Haynes  
Free Hearts  
2013 25<sup>th</sup> Ave. N.  
Nashville, TN 37208

Date: October 23, 2024

/s/ Dawn Jordan  
Special Counsel